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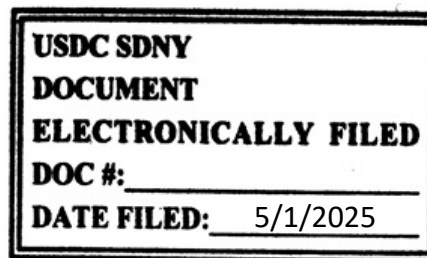
May 1, 2025

APPLICATION GRANTED

[signature]

Hon. Stewart D. Aaron, U.S.M.J.

Dated: May 1, 2025

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The Honorable Magistrate Judge Stewart D. Aaron
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

> **Re:**   ***Burts v. Commissioner of Social Security*, Case No. 1:24-cv-03596-DEH-SDA (S.D.N.Y.)**

Dear Judge Aaron:

I am *pro bono* counsel for Plaintiff Alfred Louis Burts in the above-captioned matter. On January 15, 2025, Plaintiff filed a motion for judgment on the pleadings requesting that the Social Security Administration's ("SSA") decision denying Mr. Burts Social Security Disability benefits be reversed, or in the alternative, remanded. Dkt. Nos. 20-21. On March 17, 2025, the parties filed a stipulation and proposed order providing that the SSA's decision be reversed and this action be remanded to the SSA. Dkt. No. 23. On April 3, 2025, the Court granted the parties' stipulation and entered judgment in favor of Plaintiff. Dkt. Nos. 24-25. Accordingly, Mr. Burts's application for attorneys' fees and other expenses pursuant to the Equal Access to Justice Act ("EAJA") is presently due Monday, May 5, 2025.

I write to respectfully request an extension of thirty (30) days for the deadline to file Mr. Burts's fee application, up to and including June 2, 2025. Such an extension is warranted to provide the parties additional time to confer regarding a potential agreement as to an award of fees and other expenses. This is Plaintiff's first request for an extension of the deadline to file an application for attorneys' fees and other expenses. Counsel for Plaintiff conferred with counsel for Defendant, which does not oppose this request.

Thank you in advance for your consideration on this matter.

Respectfully submitted,

/s/ Ryan Joseph Sheehan
Ryan Joseph Sheehan

cc: All Counsel (by ECF)